

TENDRING COLCHESTER BORDERS GARDEN COMMUNITY JOINT PLANNING COMMITTEE

27 FEBRUARY 2023

A.1 DEVELOPMENT PLAN DOCUMENT (DPD): SUBMISSION VERSION PLAN – REGULATION 19

(Report prepared by Amy Lester (Garden Community Planning Manager))

PART 1 – KEY INFORMATION

PURPOSE OF THE REPORT

To seek the Tendring Colchester Borders Garden Community Joint Committee's agreement to the Submission Version of the Development Plan Document (DPD) for the Garden Community and its recommendation to Full Council at Tendring District Council (TDC) and Colchester City Council (CCC) to carry out public consultation and thereafter submit the DPD to the Secretary of State to begin the process of independent examination.

EXECUTIVE SUMMARY

The purpose of the DPD is to plan effectively for growth within the TCBGC over the long term. In 2021, TDC and CCC both agreed to formally adopt the 'North Essex Authorities' Shared Strategic Section 1 Local Plan' (Section 1 Local Plan) which, amongst other things, identifies the broad location of the Garden Community and sets out the Strategic Policies and the overarching requirements and expectations that it will need to meet. With the principle of a Garden Community already agreed, the Submission Version Plan contains more detail about the development and the specific requirements that developers will be expected to follow, when preparing masterplans, applying for planning permission and carrying out the development.

The DPD seeks to set an appropriate and 'sound' strategy for the future development of the TCBGC. It is the role of the Regulation 19 stage of public consultation to invite representations on the soundness and legal compliance of the DPD based on specified criteria in the National Planning Policy Framework (NPPF). The DPD has been prepared by CCC and TDC as the Local Planning Authorities, in partnership with Essex County Council (ECC).

The Submission Version of the DPD has been informed by the comments received through the earlier public consultation on the Draft Version of the Plan in March-April 2022 as part of the Regulation 18 stage of the plan making process.

The proposals and policies in the Submission Version of the Plan have also been informed by a range of evidence base documents – updating and expanding upon the evidence already in place at Regulation 18 stage and addressing key matters raised during the previous consultation. This

evidence includes, amongst others, a Strategic Masterplan for the Garden Community, an assessment of the character of Crockleford Heath, an independent assessment of the University of Essex's expansion requirements and a viability appraisal. The conclusion of this evidence base has been collectively considered to understand its implications and it has informed Officers' recommendations on the content of the Submission Version Plan.

The Joint Committee is asked to consider and approve the Submission Version of the DPD and to recommend, to Full Council at TDC and CCC, that it be published for consultation and thereafter submitted to Secretary of State, along with any comments received, who will then appoint a Planning Inspector to examine the DPD.

In line with national regulations the Councils will seek representations on the Submission Version Plan through the consultation exercise. The public and other stakeholders will be invited to make representations indicating, in particular, whether or not they believe the Submission Version of the DPD is 'sound' based upon a set of nationally prescribed criteria. It is the intention to seek a period of six weeks for this consultation period in accordance national requirements.

RECOMMENDATION

That the Tendring Colchester Borders Garden Community Joint Committee:

- 1) notes the content of this report which presents the Submission Version of the Plan for the Tendring Colchester Borders Garden Community (otherwise known as the 'Development Plan Document' or DPD) (Appendix 1) and associated Sustainability Appraisal (Appendix 2) along with the Strategic Masterplan and other related evidence listed as background documents which together address the legal requirements of the planning system and the tests of soundness set out in the National Planning Policy Framework, having regard to the comments received in response to the 2022 Regulation 18 public consultation exercise;**
- 2) recommends to the Full Council of both Tendring District Council and Colchester City Council that they agree for the above-mentioned Submission Version of the Plan, associated Sustainability Appraisal and other related evidence be published for six-weeks' public consultation in line with Regulation 19 of the Town and Country Planning (Local Planning) (England) regulations 2012 (as amended) and Regulation 13 of the Environmental Assessment of Plans and Programme Regulations and thereafter submitted to the Secretary of State in line with Regulation 21 of the Town and Country Planning (Local Planning) (England) regulations 2012 to begin the process of independent examination;**
- 3) that Full Council authority is sought for the Garden Community Planning Manager, in consultation with TDC Director of Planning, CCC Executive Director of Place and the Chairman and Vice-Chairman of the Tendring Colchester Borders Garden Community Joint Committee, to be given delegated authority to make any minor editorial changes to the text and maps in the Submission Version of the DPD and to make necessary**

updates and additions to the evidence base ahead of their publication for public consultation;

4) notes the proposed activity for the Regulation 19 ‘Submission Version Plan’ consultation.

5) notes the representations received following the cancellation of the Joint Committee meeting of the 13th December 2022.

PART 2 – IMPLICATIONS OF THE DECISION

DELIVERING PRIORITIES

Members are reminded that the TCBGC is a corporate priority for all three of the Councils represented on the Committee and that the Councils are required to take into account the responses received to the Regulation 18 consultation exercise in making a decision as to the content of the Plan at Regulation 19 stage, when it will be published for a final round of consultation and submitted to the SoS.

RESOURCES AND RISK

The Submission Version of the DPD is a statutory stage of plan making and represents an advanced and fully formed version of the DPD that the Councils consider to be sound and ready for examination. There is a risk that should the DPD not be examined and adopted in an appropriate timescale, the ongoing ability for the Councils to manage growth within the TCBGC area in a planned manner will be compromised.

The overall Garden Community project is being managed by the three authorities through agreed budgets and through appropriate structures to ensure input and overview, not only from the Joint Committee, but also from the lead elected Councillors, Senior Officers, Planning Officers, Transport Officers, Project Team and the independent ‘Community Liaison Group’ specifically set up to provide a community input into the project. There are also structures in place for constructive engagement with the lead developers Latimer/Clarion and Mersea Homes, including an ongoing ‘Planning Performance Agreement’ (PPA) which establishes and secures funding to cover the cost of meetings and, in the coming months, dedicated resources to facilitate the pre-application process and the assessment and determination of planning applications.

It is considered the Councils approach to plan preparation, engagement and consultation to date has allowed the public and other stakeholders to have a significant opportunity to input into the process and, where appropriate, to shape the emerging DPD proposals. Importantly, however, consultation in this context does not mean that a consensus of opinion has been reached in all cases, and it is appropriate to recognise there remains opposing views to some elements of the DPD, either from residents and local stakeholders, local parish and town councils, site promoters or all. It is the

role of the consultation process to allow for these views to be made, and for the Councils to respond and reflect upon them, especially if they are advancing material considerations. It is considered that the thorough process the Councils have engaged in over the last year, which has followed the requirements of legislation and the Councils Statement of Community Involvement (SCI) documents, has allowed this to happen in an effective and meaningful manner.

The Submission Version DPD is the second occasion where the emerging DPD will be published and consulted on in a full format.

Officers have brought this paper to the Joint Committee with a view to a decision being taken by the Full Councils prior to the upcoming Local Elections. A delay in determination until after the election period is likely to pose a risk to the timetable for the overall Garden Community project and the delivery of the first phase of homes and associated infrastructure. Because the Section 1 Local Plan requires that planning permissions are not to be granted until the DPD has been completed and adopted, a delay to its adoption would have a knock-on effect to delivery on the ground.

If agreed, the proposal is to consult on the on the DPD for six weeks later in 2023 following the Local Elections. The updated version of the Local Development Scheme (LDS), (attached as Appendix 3), recommends a new timetable for the DPD. This takes into account the need to consult for a period of six weeks on the DPD, and charts a realistic timetable for independent Government Examination in Autumn/Winter 2023, with adoption of the DPD anticipated early in 2024.

The purpose of the Regulation 19 consultation stage is to allow consultees the opportunity to make representations on the 'soundness' and legal compliance of the DPD. All representations made will be considered by a government-appointed Planning Inspector who will independently examine the DPD. The Councils ability to respond to representations made through the consultation is limited than at this stage. Indeed, whilst the Councils will be able to submit minor suggested modifications to the DPD ahead of public examination this does not extend to making more significant changes.

However, if, through the Regulation 19 consultation process, it is decided there is a need for the Councils to make a significant change to the DPD, the Councils would have the ability to propose these changes as long as these are subject to a period of consultation through a further Regulation 19 consultation exercise. The risk to the Councils in this scenario is one of timeframe, and a new LDS setting out the DPD preparation timetable would need to be agreed. The extensive consultation the Councils have carried out at the Regulation 18 stage has mitigated this risk, but it should be recognised that there is always the possibility of new evidence being presented through the Regulation 19 process which could lead to a need to propose a more significant alteration to the DPD.

Link Road, Rapid Transport System (RTS) and Homes Infrastructure Funding (HIF)

In 2019 ECC successfully bid for funding from the Government's Housing Infrastructure Fund (HIF) to support planned housing growth across the country. The successful bid included forward funding of £99.9m for the A120-A133 Link Road and the Colchester Rapid Transit System (RTS) scheme.

The two schemes are an important part of the plans for growth in the wider area, and in particular the creation of the TCBGC.

- **The Rapid Transit System (RTS)**

The RTS will deliver fast, reliable and frequent public transport connecting the Garden Community and the University to the Northern Gateway via Colchester City Centre

The RTS will be delivered in 3 phases. Delivery partners are due to be appointed for the northern section of the RTS by next month and ECC is shortly due to carry out a tendering exercise for the City Centre and eastern sections, further demonstrating progress on delivery ahead of development at TCBGC.

- **Link Road**

The Link Road will connect the A133 to the A120. It will be needed to mitigate the impact on the road network of the Garden Community development.

Since the award of the funding, the cost of the Link Road scheme has increased and ECC have made a formal request to Homes England to find a funding solution and to extend the timetable for delivery. The increased costs submitted to Homes England was for an additional £21m.

ECC continues to work constructively with Homes England to resolve the position and to ensure the infrastructure is brought forward as quickly as possible.

While the formal contract variation is awaited, it is believed that the proposed solution will be that the full RTS and first phase of the Link Road will be required to be delivered within the £99.9m funding envelope and by March 2026. Following a formal contract variation with Homes England - ECC will retender for a contractor to deliver the first phase of the Link Road by March 2026.

As part of the HIF contract the Councils are required to recover as much of the £99.9m as possible through developer contributions to reinvest in infrastructure to support additional housing growth in the future. The developer contributions that would have been recovered and reinvested for future housing growth will instead be used to fund the completion of the Link Road.

The viability evidence (and the Infrastructure Delivery, Phasing and Funding Plan) prepared on behalf of the Councils demonstrates that the identified increased costs for the Link Road could be met by the developer.

The Section 1 Plan requires planning consent and full funding approval for the Link Road and Route 1 of the RTS to have been secured before planning approval is granted for any development at the garden community. Planning permission has been secured for both of these strategic infrastructure projects. The funding and delivery of the remainder of the Link Road would be a matter for any future planning application and associated Section 106 agreement when it comes forward for approval. Infrastructure delivery must align with each development phase and should appropriately mitigate the impacts of the development at each phase.

Section 1 of the Plan does not require either the funding to be agreed prior to the adoption of the DPD, nor does it require the full Link Road to have been constructed prior to any other development within the TCBGC.

Failure to approve the Submission Version Plan and to proceed to the Regulation 19 consultation stage would result in a further risk to the timescale for the Housing delivery as set out in the HIF grant determination agreement which may result in Homes England withdrawing the agreed HIF funding exposing ECC to significant financial risk.

This would put at risk the delivery of the TCBGC and subsequently the projected annual housing and employment land requirements for the Section 1 Local Plan period for both TDC and CCC that would be met by the TCBGC project. Approval of the DPD is therefore a crucial step to strengthen our position and provide confidence to Government in securing the £99.9m of infrastructure investment in NE Essex.

LEGAL

The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) make provision for the operation of the local development planning system including, for the purposes of this report, regulations relating to the preparation, publication and representations relating to a Local Plan or DPD and the independent examination.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 (as amended) state that applications for planning permission must be determined in accordance with the 'Development Plan' unless material considerations indicate otherwise. The Submission Version Plan for the Garden Community is a 'Development Plan Document' which will carry the same legal status as a Local Plan and which, on adoption, would sit with the Local Plan (including the Essex Minerals and Waste Local Plans) as part of the statutory 'Development Plan' for both Tendring and Colchester. The plan-making process and the associated legislation, regulations and national planning policy and guidance applicable to the Plan for the Garden Community are essentially the same as those applicable to the preparation and review of Local Plans.

Section 33A of the 2004 Act places a legal duty upon local authorities and other public bodies to engage constructively, actively and on an on-going basis on strategic matters of cross-boundary significance (which includes housing supply) to maximise the effectiveness of Local Plan preparation and also applies to the Plan for the Garden Community. This is known as the 'Duty to Cooperate'. Paragraphs 24 to 27 of the National Planning Policy Framework (NPPF) stress that close cooperation between District Councils and County Councils (in two tier areas) will be critical to ensure that both tiers are effective when planning for strategic matters and necessary infrastructure. In this instance, the Tendring and Colchester Councils will need to demonstrate they have complied with the Duty as they are the Local Planning Authorities. Before Planning Inspectors can begin the process of examining a Plan, they need to be satisfied that the relevant local authorities have demonstrated that they have done everything they can to ensure effective cooperation with their neighbouring authorities, ECC and other statutory and partner organisations and have sought to resolve, as far as is possible, any cross-boundary planning issues. To date, Tendring and Colchester Councils have complied with the Duty to Cooperate, as confirmed by the government Planning Inspector in his final post-examination report which allowed Tendring and Colchester to formally adopt the Shared Section 1 Local Plan. ECC is continuing to carry out its functions properly by engaging in the plan-making process. The ongoing cooperation between Officers and Members of the Councils and the positive engagement with wider stakeholders on this project, culminating in the setting up of a Joint Committee is a positive demonstration of continued compliance with the Duty to Cooperate.

Section 19 of the 2004 Act requires local planning authorities to carry out a 'Sustainability Appraisal' for Local Plans and other Development Plan Documents and consider the consequence of reasonable alternatives, during their preparation and, in addition, prepare a report of the findings of the Sustainability Appraisal. More generally, section 39 of the Act requires that the authority preparing a Plan must do so "with the objective of contributing to the achievement of sustainable development". The purpose of a Sustainability Appraisal is to ensure that potential environmental effects are given full consideration alongside social and economic issues. A Sustainability Appraisal (SA) has been produced for the Submission Version Plan (Appendix 2) and will need to be published for consultation alongside the Plan as part of the statutory plan-making process.

The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) make provision for the operation of the local development planning system including, for the purposes of this report, regulations relating to the preparation, publication and representations relating to a Local Plan or Development Plan Document and the independent examination.

Like a Local Plan, the Plan for the Garden Community will ultimately be tested, through the examination process, to meet both legal requirements and the 'tests of soundness' set out in the latest NPPF which was last updated in 2021. The tests of soundness are:

- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that

unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

Because the Shared Section 1 of the Local Plan which has already been examined and adopted sets out specific policy requirements for the Garden Community and the content of the DPD, the Councils will also need to ensure and demonstrate to the Inspector through the examination that the Plan also meets with those requirements. The Plan must also be prepared in accordance with the Councils LDS and SCI to be found sound, the engagement process has followed the requirements of legislation and the Councils SCI documents, and the LDS updated as required.

Only on confirmation of the legal compliance and soundness of the Plan following the examination process, can the Councils proceed to formal adoption.

OTHER IMPLICATIONS

Area, Ward or Divisions affected: The Garden Community development will affect land within both TDC and CCC authority boundaries, associated ECC Divisions and the corresponding local electoral wards of Elmstead Market, Ardleigh, Greenstead and Wivenhoe. The economic, social and environmental impacts of the development are likely to be felt, directly or indirectly, over a wider area – as reflected in its status as a strategic proposal in a Shared Section 1 Local Plan for North Essex.

Equality and Diversity: The Submission Version Plan for the Garden Community contains policies aimed at promoting inclusiveness, equality and diversity. These include policies to ensure a mix of housing sizes, types and tenures to meet the requirements of different groups in society including people with disabilities or mobility issues, people with low incomes, people in need of care and gypsies and travellers. There are also policies aimed at ensuring accessibility to jobs, shops, services and facilities can be achieved by a variety of transport modes with priority given to walking, cycling, rapid transit, public transit and mobility vehicles whilst still enabling access by private vehicles. Policies around public realm and green infrastructure also promote inclusive environments and accessibility for people with different disabilities.

The Public Sector Equality Duty applies to the Councils when it makes decisions. The duty requires the Council to have regard to the need to:

- (a) Eliminate unlawful discrimination, harassment and victimisation and other behaviour prohibited by the Act. In summary, the Act makes discrimination etc. on the grounds of a protected characteristic unlawful.
- (b) Advance equality of opportunity between people who share a protected characteristic and those who do not.
- (c) Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.

The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion or belief, gender, and sexual orientation. The Act states that 'marriage and civil partnership' is not a relevant protected characteristic for (b) or (c) although it is relevant for (a).

Crime and Disorder: The Submission Version Plan aims to deliver a new community that promotes employment, skills and training opportunities as well as health and wellbeing. Its policies require design and architecture to minimise the opportunities for crime and working with Essex Police in the drawing up of detailed plans. The Councils have given careful consideration to all the comments received at Regulation 18 stage and in drafting the Submission Version Plan for Regulation 19 stage, ensuring that the Plan continues to address issues around crime and disorder.

Health Inequalities: The Submission Version Plan has been drawn up through positive engagement with health stakeholders, and policies within it promote health and wellbeing and embed the Healthy New Towns and active design principles. It has been important for the Councils to give careful consideration to all the comments received at the Regulation 18 stage and in the Submission Version Plan for the Regulation 19 stage, ensuring that the Plan continues to address issues around health inequalities.

PART 3 – SUPPORTING INFORMATION

BACKGROUND

In 2021, TDC and CCC both agreed to formally adopt the Section 1 Local Plan which, amongst other things, identifies the broad location of the Garden Community and sets out the Strategic Policies and the overarching requirements and expectations that it will need to meet. The Section 1 Local Plan was prepared in partnership with ECC.

The adoption of the Section 1 Local Plan followed years of technical analysis, public consultation, and an independent examination by a government-appointed Planning Inspector. The independent examination enabled the Planning Inspector to conclude that the Garden Community would be the most appropriate and sustainable option for meeting the need for long-term growth in the North Essex area – having considered and discounted a variety of alternative ideas and options.

In addition to the Section 1 Local Plan, TDC and CCC each have their own Section 2 Local Plans, which contain policies and allocations specific to each Council area. TDC adopted its Section 2 Local Plan in January 2022 and CCC adopted its Section 2 Local Plan in July 2022. **Upon adoption of the TCBGC DPD all policies contained within both the TDC and CCC Section 2 Local Plans will be replaced for the purposes of the Garden Community site allocation area as defined by the DPD ‘Policies Map’ (attached as Appendix 4).**

SUMMARY OF REGULATION 18 CONSULTATION

The consultation at Regulation 18 allowed the Councils to consult on a full version of the DPD for the first time, and to consider responses, before moving to the formal Regulation 19 stage. The consultation process, which took place between 14 March and 25 April 2022, led to responses from 193 consultees, including from statutory organisations, local organisations, parish and town councils, the Community Liaison Group (CLG), local residents and site promoters. Officers have reflected upon these responses in moving the DPD forward. A full summary of the consultation responses will be made available as part of the consultation into the Regulation 19 Submission Version DPD.

At its meeting on the 18th July 2022, the Joint Committee was presented with a report (see [link](#)) highlighting the most notable issues and concerns raised in the representations received through consultation on the Regulation 18 Draft Plan. The three main issues reported to, and discussed by, the Joint Committee were:

- **Green Buffers and Land South of the A133**

In particular, the approach to any development taking place on land south of the A133 and the very different views expressed by community representatives and a large number of local residents (around half of all respondents to the consultation), the University of Essex and lead developer Latimer;

- **Salary Brook**

The potential adverse impacts of development extending westwards and onto the environmentally and visually sensitive slopes around Salary Brook for the purpose of knowledge-based employment; and

- **Crockleford Heath and Bromley Road**

The approach to development in and around Crockleford Heath and the wider area including local concerns about the extent and purpose of the proposed ‘Area of Special Character’ designation, its corresponding policy wording and what form of development might result.

The Committee was advised that Officers were already minded to accept local concerns about development extending onto the slopes of Salary Brook. However, in respect of the comments raised in relation to development south of the A133 and around Crockleford Heath, further work and technical evidence would be required to inform any decision on possible further changes going forward. This technical evidence has now been completed and changes incorporated into the Submission Version Plan on all three of these key issues. These changes are discussed in detail below under 'Land Uses and Spatial Approach', whilst specific land allocation can be seen on the Policies Map which can be found at Appendix 4.

CHANGES INCORPORATED IN THE SUBMISSION VERSION DPD

Officers have reviewed and considered the comments made, alongside any other material issues not previously considered. Revisions have been incorporated into the Submission Version Plan which has been informed by proportionate technical evidence, strategic masterplanning work and comments received through the formal and informal public engagement activities.

As noted within the 'Resources and Risks' section of this report, consultation does not mean that a consensus of opinion is reached on all issues. Furthermore, receiving a large number of responses on a matter, does not in a planning context mean that it is correct and can take precedence. There will remain opposing views to some elements of the DPD, either from residents and local stakeholders, local parish and town councils, site promoters or all. It is the role of the consultation process to allow for these views to be made, and for the Councils to respond and reflect upon them appropriately.

The changes made do not alter the core strategic approach to the TCBGC which has been established by way of the allocation under the Section 1 Local Plan. All sections and policies of the Draft Plan have been reviewed, revised and refined in response to the Regulation 18 consultation and the developed evidence base. Three principal areas of progression in policy development have emerged, these being the approach to land use, employment land and place shaping principles. Each of these are discussed in more detail below:

- **Land Uses and Spatial Approach**

Taking forward the requirements of the Section 1 Local Plan and considering the views of the community and other stakeholders, Policy 1 of the Submission Version Plan sets out the key land uses and spatial parameters within which the Garden Community is expected to be built. It also sets out the Councils' expectations for the information that will need to be submitted and approved ahead of the determination of any outline or detailed planning applications for development of the Garden Community. This will enable the Councils to ensure that development will achieve a comprehensive approach that delivers both the garden community principles and the Councils' high expectations for design and quality.

Development will be confined to land within the Garden Community location as identified in the Section 1 Local Plan with the addition of a small triangle of land south of the A120, and will adhere to the 'Land Use Parameters', as shown on the Policies Map (Appendix 4). Land within the identified Garden Community location will be specifically allocated or protected for the following uses:

- Delivery of circa 7,500 new homes with a range of shops, jobs, services and community facilities, including education. These will be provided within three 'Neighbourhoods' being South, North and Crockleford.
- A new 'Salary Brook Country Park' incorporating land and woodland at and around the Salary Brook Local Nature Reserve.
- A 'Wivenhoe Strategic Green Gap' incorporating land north of Brightlingsea Road and west of Elmstead Road.
- An 'Elmstead Strategic Green Gap' east of the new A120-A133 Link Road.
- A Sports and Leisure Park to serve the local community and for the expansion of sports facilities for the University of Essex.
- Approximately 25 hectares of employment land in form of a new Business Park and a 'Knowledge-Based Employment' site.
- Provision for the Rapid Transit System.
- A Gypsy and Traveller Site.
- A 'Park and Choose' facility.

The strategy for development at the Garden Community confines the majority of development to land south of the A120, north of the A133, west of the new A120-A133 Link Road and east of a new country park (Part E) to be designated around Salary Brook Local Nature Reserve. In addition, selected land around the area of Crockleford Heath has been specifically identified as an Area of Special Character, where development must preserve or enhance its intrinsic character.

Land is designated and shown on the 'Policies Map' as Strategic Green Gaps. Land within the Strategic Green Gaps will be protected from most forms of built development to ensure the Garden Community does not extend or sprawl into locations where it could eventually merge or coalesce with Wivenhoe or Elmstead Market – one of the main concerns raised by local people throughout the public engagement activities. Additional open space is proposed adjacent to Salary Brook Local Nature Reserve to strengthen this area as a buffer to the Colchester urban area encompassing the steep adjoining slopes of the brook as well as nearby woodland. This designation will also prevent coalescence in the Greenstead and Longridge areas.

The evidence has developed to show that the residential capacity of the site is towards the lower end of the 7,000 to 9,000 range set out in the Section 1 Local Plan. This is given the physical constraints of the site with boundaries defined by the Strategic Green Gaps and both

the existing and proposed roads. The total number of new homes expected at the Garden Community has therefore been refined to circa 7,500 within the Submission Version Plan.

- **Economic Activity and Employment**

The main requirements relating to economic activity and employment within the Submission Version Plan, as set out in the policies of the Section 1 Local Plan include:

- Providing and promoting opportunities for employment within the new community and within sustainable commuting distance of it, and
- The provision of a mix of land uses and services with well-defined public and private spaces to create sustainable well-designed neighbourhoods.

The approach to maximising the economic potential of the Garden Community has been informed by the evidence base and discussions with education providers and businesses within different sectors. Policy 5 of the Submission Version Plan has refined the economic policy of the Draft Plan and explains how the requirements will be achieved, with an aim of creating at least one job per new household within easy commuting distance.

Policy 5 requires an appropriate balance of homes and jobs within the TCBGC. It also details employment allocations and uses for the new A120 Business Park, the Knowledge-Based Employment Land and the North and South Neighbourhood Centres. It further would protect those land use allocations for employment purposes to ensure the Garden Community is served by a flexible range of land and property for the provision of commercial activity and jobs.

- **Buildings, Places and Character**

The 'Buildings, Places and Character' chapter of the Draft Plan has been substantially restructured for the Submission Version Plan. The chapter now has two policies, being Policy 3 'Place Shaping Principles' and Policy 4 'Meeting Housing Needs'. Considering consultation responses, emerging evidence and a review of the policy wording, Officers considered that these two important themes required distinction and further elaboration.

Policy 3 'Place Shaping Principles'

For the Garden Community to be successful, one of the main objectives is to ensure it is unique, self-sufficient and can provide high quality design. Taking forward the requirements of the Section 1 Local Plan and taking into account the views of local people and other stakeholders, Policy 3 sets out the Councils' expectation for the Garden Community to be unique and distinctive in its character and appearance, and for the new homes to meet high standards that will meet a variety of different needs and demands for people and families over the courses of their lives. Policy 3 details the standards expected with regard to the following:

- Creation of a Unique and Distinctive Place
- Design of Places

- Design Quality
- Designing Out Crime
- Residential Design
- Internal Space Standards, Home-working and Adaptability in New Homes
- Private Amenity Space Standards, and
- The Historic Environment

Policy 4 'Meeting Housing Needs'

Taking forward the requirements of the Section 1 Local Plan, Policy 4 of the Submission Version Plan has developed to ensure that development will be of appropriate densities which reflect both the context, place-making aspirations and opportunities for increased levels of development around centres and transport hubs. It further will secure an appropriate mix of housing types and tenures including self and custom build and starter homes including a minimum of 30% affordable housing, phased through the development. This policy sets out the Councils' expectation for new homes within the Garden Community to be of a high standard that will meet a variety of different needs and demands for people and families over the courses of their lives. Policy 4 details the standards expected with regard to the following:

- Projected Housing Needs
- Affordable Housing
- Adaptable and Accessible Housing Standards
- Housing Density
- Self-Build and Custom-Built Homes
- Care, Assisted Living and Other Specialist Housing
- Gypsy and Travellers, and
- Student Accommodation

The amendments incorporated in the Submission Version Plan at Policy 3 and Policy 4, as summarised above, reflect the Councils very high expectations for how the Garden Community will create unique and distinctive buildings and neighbourhoods, whilst still respecting the character and visual amenity of nearby towns, villages, historic buildings, structures and the character and features of the landscape. Further it will secure that the Garden Community will be inclusive and accommodate a diverse range of households meeting a range of housing needs.

In addition to the above a further refinement of all policies has developed in response to the detailed evidence base. Areas of note include:

- **Health**

Policy 6 of the Submission Version plan establishes the requirements for ensuring the Garden Community is served by community services and facilities of the right type in the right location, including early years and childcare facilities, schools and sports facilities; as well as access to health services and how the development will incorporate measures to encourage

inclusive, healthy, and happy lifestyles. Part E of Policy 6 requires that the Garden Community creates an active environment that promotes health and wellbeing and builds a strong community.

- **Biodiversity Net Gain (BNG)**

The Vision for the Garden Community is that the natural environment will be its biggest asset with Net Gains in biodiversity and a thriving ecological network which will shape the Garden Community ensuring native species thrive. The Councils consultants have undertaken biodiversity net gain calculations of the Strategic Masterplan, which indicates that 12.5% biodiversity net gain can be achieved. In light of this evidence, Part D of Policy 2 'Nature' has been updated to require that proposals must deliver a minimum of 10% measurable biodiversity net gain on-site, in accordance with national policy, with an aspiration to achieve 15%.

EVIDENCE BASE CONCLUSIONS

The following work has been undertaken and concluded to provide evidence to enable robust decisions to be taken on the following topics:

- **University Growth Forecasts Assessment**

At Regulation 18 The University of Essex submitted a representation to the Councils supporting the principle of the TCBGC but also noting that the proposed approach set out in the Draft Plan did not identify sufficient land to accommodate the University's growth ambitions. The University's representation set out their own quantified land requirements.

Independent specialist consultancy support was commissioned to consider the growth potential of the University, both in terms of student numbers, research potential and wider economic relationships. The findings have established that further expansion of Knowledge based employment would be appropriate (albeit at lower scale than requested), and that the growth forecast of the University for student growth and related accommodation is reasonable but could be addressed in various ways. It further establishes that projected sports and recreation provision aligns with wider evidence relating to TCBGC sports and leisure requirements. This workstream has provided strategic direction for the development of the masterplan and shaped the policy development within the Submission Version Plan.

- **Economic and Employment Study**

An Economic and Employment Study has been completed, and which sets out the evidence, analysis and recommendations which has informed the drafting of Submission Version Plan. The study concluded that the prospects for a business park (B2/ B8 logistics, industrial and ancillary office) with direct access to the A120 are very strong. Market signals indicate these uses should be capable of being delivered early in the programme. The opportunity for a university-linked commercial space and/or higher density office and lab space should be developed in the 'Knowledge-Based Employment Land'. The study shows there is a long-

term opportunity to build networks to promote and sustain commercial activity at the Garden Community creating highly skilled jobs.

The study also recommends the provision of flexible office space concentrated in Neighbourhood Centres; this should be small in scale to meet local need. A key objective is to ensure economic uses help to create a successful, integrated, and balanced community with vibrant centres that include a mix of employment opportunities and services. A mix of employment uses provides flexibility and the ability to respond to market strengths and opportunities. A realistic level of self-containment should also be achieved, with as many commuting journeys as possible undertaken through walking, cycling and public transport. Sustainable access to employment opportunities in neighbouring major employment centres or surrounding towns in Tendring and Colchester will need to be provided.

- **Crockleford Heath Area of Special Character Assessment**

The Draft Plan identified an 'Area of Special Character' at and around the settlement of Crockleford Heath, aimed at safeguarding its distinctive rural character. The Councils commissioned additional work to consider this area in more detail including the landscape and its historic and built environment appraisals. Place Services were commissioned to undertake the character appraisal of the area and local residents were included in the preparation and gathering of evidence.

Findings have identified landscape features and buildings which make a positive contribution to the character of the area, these include historic buildings across the settlement which have retained some original features and contribute to the historic, rural character of Crockleford Heath. One Local Landscape Character Type (LLCT) has also been identified and within this, an additional four Local Landscape Character Areas (LLCAs) have been highlighted for their interest/importance. This workstream has provided strategic direction for the development of the masterplan and shaped the policy development within the Submission Version Plan. This includes that within the identified area of special character, development must preserve or enhance the intrinsic character of the area, whilst within the wider setting/environs of Crockleford Heath development should respect/respond positively to the existing landscape structure.

- **Health Impact Topic Paper**

A Health Topic Paper was prepared to support the policy development within the Submission Version Plan. The purpose of this Topic Paper was to provide background information on the subject of health and wellbeing in relation to the development.

This workstream has provided strategic direction on how the health and wellbeing provision will be set out in the Garden Community – to ensure that an innovative and transformational health vision is secured, and that this can be used by all partners to deliver new communities that can positively influence their own physical and mental health via a strong community asset-based approach. Designing the wider environment to allow these strong communities

to flourish, we will test and learn from the joined-up planning approach to transfer to other surrounding communities. This will ensure that health and local planning authorities continue to work together at each stage of planning and development of the proposed Garden Communities.

- **Infrastructure Phasing and Delivery Plan**

Officers have finalised an 'Infrastructure Delivery, Phasing & Funding Plan' which provides an update to previous infrastructure planning work done in relation to the Garden Community. The update sets out a range of requirements that are already known and continue to be needed (for example, new schools, health and community facilities related to population growth), which are required by policy in the adopted Section 1 Local Plan and has shaped the policy development within the Submission Version Plan.

The IDP draws together information across all types of infrastructure, showing what is required, how it will be provided; how it will be funded and when it will need to be provided to align with the phasing of the Garden Community. The IDP aligns with the outcome of the Strategic Masterplan work as well as addresses responses from strategic infrastructure providers to the Regulation 18 consultation and further consultation that was been undertaken over the summer.

The term 'infrastructure' covers a wide range of services and facilities provided by public and private organisations and the definition of infrastructure is outlined in Section 216(2) of the Planning Act 2008 (as amended). The updated IDP work covers the following infrastructure areas, which will be secured by the Submission Version Plan:

- Schools and other educational facilities.
- Social, community, health and wellbeing (including flexible community space to accommodate a range of local community groups and activities).
- Leisure and recreational facilities (including children's play, youth and sports facilities).
- Open space/green infrastructure.
- Utilities.
- Transport, including highways matters (including the potential need to address funding requirements for strategic improvements such as the A120-A133 Link Rd, and additional measures to secure modal shift, including investment in walking and cycling connections and facilities).
- Flood defences.
- Emergency services.
- Waste.

- **Transport Study (Modal Shift & infrastructure)**

Additional work has been undertaken by the Councils to review the approach to transport and movement, with a focus on defining and identifying necessary measures to secure modal shift to reduce reliance on the private car. The Councils commissioned consultants Integrated

Transport Planning (ITP) and Jacobs to prepare an updated transport evidence report, which also addressed the Section 1 Local Plan requirement for the DPD to outline target modal shares for each transport mode and details of sustainable transport measures to support their achievement.

The evidence provides a detailed overview of the transport and movement implications of TCBGC and includes a comprehensive mitigation strategy that has been developed to maximise opportunities for active and sustainable travel through:

- Inclusion of a range of measures on TCBGC and its immediate environs – both in relation to its overall design approach to create walkable neighbourhoods with good access to services and facilities, but also through the inclusion of a number of measures to promote active travel and use of public transport, including provision of RTS; and
- Measures off the garden community measures on key connecting routes and integration with wider transport and movement networks and strategies.

The identified mitigation measures have been selected to align with the Colchester Future Transport Strategy and Active Travel Essex programme. The measures included have been classified into five, not mutually exclusive, categories of schemes:

- Active travel
- Public transport
- Traffic management
- Highway capacity
- Travel planning

It is recognised that combinations of measures will need to be used together to mitigate garden community impacts. Hence a series of 'route and area' packages have been developed which are aligned to the evidence on the unmitigated impact of TCBGC. In this way, it is easier to establish the connection between packages of measures to address severe transport impact.

The measures will contribute to achieving the modal share targets (the number of trips by walking, cycling and public transport and private vehicle), which are to be phased and monitored across the build out of the Garden Community.

- **Sport, Recreation and Open Space Study**

Consultants KKP were commissioned to provide an over-arching strategy for Open Space, Playing Pitches and Indoor Built Facilities for the Garden Community. This involved assessing the existing provision serving both Colchester and Tendring residents, and includes a review of all existing facilities in the Councils' areas, including council-owned facilities and privately-owned facilities where appropriate. The outcomes of these audits have informed stand-alone strategies for each authority. These strategies have been looked at in combination with the requirements arising from the Garden Community. Findings, in

combination with the sports provision assessment contained within the University Growth Forecasts Assessment, have been assessed by Officers and fed into the strategic masterplanning work.

The strategies make recommendations for specific joint use facilities that will serve existing residents and those of the garden community. There is an opportunity for the co-location of affordable and sustainable leisure facilities. One model is for a Sports Hub that would offer grass and artificial pitches for a variety of sports, as well as athletics provision. Combining built facilities, such as fitness gym with studios into one location with swimming pools has two key benefits. It effectively enables delivery of positive health and wellbeing outcomes whilst improving the financial outcomes of the facility. The strategies highlight the importance of co-location of educational and community facilities, and this is achievable when multi-use is embedded in the design phase.

- **Viability Assessment**

The TCBGC site was subject to detailed consideration of viability during the Section 1 Examination in Public with evidence gathered and considered as part of the 2018 and 2020 hearings. Extensive information already existed on scheme viability which was thoroughly tested leading to the TCBGC to be found viable and deliverable. There have been changes in market conditions since that evidence was assembled and the Councils appointed consultant surveyors Gerald Eve to review and update the viability evidence. Gerald Eve have produced a 'Financial Viability Update Report' (February 2023) which has reassessed the viability of the scheme with regard to the policies set out in the adopted Section 1 Plan and emerging DPD, together with the latest infrastructure requirements. In line with wider market practice for assessing similar initiatives, Gerald Eve have assessed the overall scheme through a cash flow model using a 'Master Developer' methodology. Given the long-term nature of the scheme and potential for assumptions to change over time, the assessment also includes a number of sensitivity tests and scenarios. The report has concluded that the proposal can viably comply with the planning policy requirements and accommodate a wide range of infrastructure needs. This scheme is therefore still viable and deliverable in line with local and national policy.

- **Strategic Masterplan**

The spatial approach to the Garden Community has evolved and become more detailed through a strategic masterplanning process. The masterplanning work has considered the baseline position (including constraints and opportunities analysis), the overall spatial vision and initial land use and masterplan options.

The detailed strategic masterplanning has been progressed to illustrate, justify and set the basis for land use proposals set out in the Submission Version Plan, drawing on the wider evidence base. The work illustrates how it is envisaged that the Garden Community will be developed and ensures that there robust and sound evidence in support of the DPD. The Strategic Masterplan remains separate to the DPD and is illustrative in nature.

It is important to acknowledge that at this stage of planning for the Garden Community, it is not possible (primarily due to the extent, cost and time required to undertake all of the detailed technical site survey and design work that would be required - which is the responsibility of site developers to inform their planning applications) for masterplanning development and related policies in the DPD to contain precise details of design, layout and appearance of the new buildings and spaces that will be delivered. Instead, the strategic masterplanning work illustrates how development could be brought forward and provides further direction to developers to enable them to prepare appropriate and more detailed proposals.

Other evidence studies and background work has also come forward, including a Stewardship Topic Paper which is reported in detail under paper **A.2** to this committee. A Housing and Demographics Update has developed a site-specific, high-level report focussed on establishing the housing needs for the Garden Community and which has fed into the Submission Version Plan. In addition, the Habitat Regulations Assessment (HRA) is at an advanced stage of development, as is the Stage 2 Integrated Water Management Strategy (IWMS) the emerging conclusions of which have been drawn into the Strategic Masterplanning, the policy development of the Submission Version Plan and support the Sustainability Appraisal (SA). Both the HRA and IWMS will be completed before consultation commences.

SUSTAINABILITY APPRAISAL

Under the Planning and Compulsory Purchase Act 2004, a Sustainability Appraisal (SA) is mandatory for Development Plan Documents (DPDs). It is also necessary to conduct an environmental assessment in accordance with the Strategic Environmental Assessment (SEA) Regulations (as amended). The SEA Regulations remain in force post-Brexit and it is a legal requirement for the Plan to be subject to SA and SEA throughout its preparation. SA and SEA are tools used at the plan-making stage to assess the likely effects of the plan when judged against reasonable alternatives.

Land Use Consultants (LUC) has carried out a SA, incorporating SEA, of the Submission Version Plan on behalf of the Councils (Appendix 2). Previously LUC carried out the Additional Sustainability Appraisal for the Section 1 Local Plan. The SA report is appended to this Committee report so that members are informed of the likely effects of the Plan and why alternatives have been discounted. The SA report must be published for public consultation alongside the plan to which it relates.

The SA appraised the policies and reasonable alternatives and has considered the Plan's cumulative effects. The Plan must be in conformity with the adopted Shared Section 1 Local Plan, which limits the alternatives for both the Plan's policies and the masterplan. Options that are not in conformity with the Section 1 Local are not reasonable alternatives.

Taken as a whole, the SA concludes that the Submission Version Plan sets out a positive plan for the achievement of the Garden Community. The policies of the plan set a high standard which

development will be required to meet and it is considered consistent with the principles of sustainable development.

REGULATION 19 CONSULTATION SUMMARY PLAN

If the Submission Version Plan is agreed by the Joint Planning Committee and the Full Councils of TDC and CCC, the proposal is to consult on the DPD for six weeks following the Local Elections. A downloadable PDF of the Submission Version Plan will be made available on the engagement website and in paper form in TDC and CCC council offices and local libraries, alongside the necessary statutory documentation (for example, the Sustainability Appraisal).

Given the more formal nature of the Regulation 19 consultation and following feedback requesting that commenting on specific policies be made easier, anyone wishing to comment on the Submission Version Plan online will be directed to a new web page where the consultation questions will be held. This web page will use consultation software that complies with the legal requirements of the Regulation 19 consultation, rather than the more informal approach used on the engagement website to date.

The Regulation 19 consultation specifically requires comments on 'soundness' and 'legal compliance'. These requirements will be explained via supporting content on the engagement website, such as an explainer film and text, and within a 'Guide to Commenting' document.

In addition to the Councils carrying out their statutory consultation requirements, a range of non-digital and digital publicity and engagement activities will be undertaken, this could include where appropriate and considered necessary:

Non-digital activity:

- Posters in community spaces throughout Colchester and Tendring
- Adverts in the Daily Gazette (Colchester) and Clacton Gazette
- Advert in Look Magazine (sent free to circa 80k homes in Colchester and Tendring, dependant on alignment of publication schedules and consultation dates)
- Adverts in widely circulated free local community magazines (dependant on alignment of publication schedules and consultation dates) such as the Ardleigh Advertiser, Alresford Advertiser and Upmarket Magazine
- Bus Stop adverts (6 sheets) (subject to the availability of suitable media space aligned with consultation dates)
- Drop-in events – where planners will be available to assist stakeholders/residents with any questions. (Representations/comments cannot be made at events, they must be submitted formally via letter/email/online)

Digital activity:

- E-newsletters
- Non-paid social media on Facebook, Twitter, and LinkedIn

- Paid social media on Facebook and Instagram
- Spotify advertising (music streaming service)
- Online advertising with Newsquest and Business Times in Essex
- Web banners on Council websites

REPRESENTATIONS FOLLOWING CANCELLED 13.12.23 JC MEETING

The Joint Committee had been due to formally meet on the 13th December 2022. Due to inclement weather, some Members were unable to travel and as such submitted their apologies. This meant that the formal meeting would have been inquorate and could not take place. The Chairman therefore cancelled the meeting.

The Chairman subsequently asked those members of the public who had registered to speak, to submit the text of the statements that they had intended to make. Four statements were subsequently submitted and circulated to Members of the Joint Committee. These statements have been summarised below:

Carolyn Mason, Ardleigh Parish Council

- Ardleigh Parish Council has welcomed the Character Assessment of Crockleford and Crockleford Heath, and seeks the greatest possible protection for this historic and special area.
- Notes the recent announcement by the Housing Secretary that concessions will allow local authorities to build fewer homes if they can show that meeting centrally imposed targets would significantly alter the character of their area.
- States that the proposed development and housing density for Crockleford will most definitely alter the character of the area.

Manda O'Connell, TCBGC Community Liaison Group

- Notes that the non-digital methods outlined in the Regulation 19 Consultation Activity Report are considerably more limited.
- Raises concern over the departure of the TCBGC Communication Officer and urge the Committee to retain this role.
- Notes the mismatch between land allocated in the DPD for Essex University's growth ambitions and the University's own Reg 18 representation.
- Commends to the Committee the CLGs Regulation 18 representation which is supported by emerging evidence.
- The CLG welcome the infrastructure list supplied.

Rik Andrew, Town Councillor for Wivenhoe

- Requests consideration be given to renaming the TCBGC.
- Notes that the old assumptions on which TCBGC plans were based are no longer valid.
- University expansion should be subject to an entirely separate planning process.
- Consideration needs to be given to providing sustainable alternatives to car use.

- Why should RTS follow the A133? A diagonal route to the centre of the new town would be quicker giving RTS users an advantage over private cars.
- In conclusion notes that the A120-A133 link road is not needed.

Russ Edwards, Latimer by Clarion Housing Group

- Update provided on recent Latimer activity and a summary of key focus areas. Including DPD and Strategic Masterplan support, enhancement of evidence base and mobilisation in advance of Latimer's Masterplanning Activities.
- Reiterates that this extensive activity demonstrates to the community, the Members and the officers of ongoing commitment to ensuring that this new community meets our combined aspirations. Continue to make significant investments and look forward to building genuine momentum following completion of the Councils' own work.

APPENDICES

Appendix 1: Tendring Colchester Borders Garden Community Submission Version Development Plan Document

Appendix 2: Sustainability Appraisal Reg 19 (Feb 2023)

Appendix 3: Updated extract from the TDC and CCC Local Development Scheme (LDS)

Appendix 4: Submission Version DPD Policies Map

BACKGROUND PAPERS

- [TCBGC Transport Evidence, Part 1: Mode Share Targets \(Feb 2023\)](#)
- [TCBGC Transport Evidence, Part 2: Transport Measures \(Feb 2023\)](#)
- [Crockleford Heath & Environs, Character Appraisal Plan \(Feb 2023\)](#)
- [TCBGC Economic and Employment Study \(Dec 2022\)](#)
- [TCBGC Review of University of Essex Land Requirements \(Nov 2023\)](#)
- [Colchester Office & Industrial Markets \(Nov 2021\)](#)
- [TCBGC Health Topic Paper \(Jan 2023\)](#)
- [TCBGC Financial Viability Evidence Update \(Feb 2023\)](#)
- [TCBGC Infrastructure Delivery, Phasing and Funding Plan \(Feb 2023\)](#)
- [Colchester and Tendring, Open Space, Playing Pitch, Outdoor Sports and Built Facility – Overarching Strategy \(Jan 2023\)](#)
- [TCBGC Strategic Masterplan Framework \(Feb 2023\)](#)
- [TCBGC Viewpoints Wireline Testing Document \(Feb 2023\)](#)

**A.1 Appendix 1: Tendring Colchester Borders Garden Community Submission Version
Development Plan Document – SEE ATTACHED DOCUMENT**

A.1 Appendix 2: Sustainability Appraisal – SEE ATTACHED DOCUMENT

A.1 Appendix 3: Updated extract from the TDC and CCC Local Development Scheme (LDS)

Tendring Colchester Garden Community Development Plan Document (DPD)		
Subject and Scope	This document will contain policies and allocations to guide the new Garden Community proposed at the Tendring/Colchester border. This DPD will be produced jointly with Colchester Borough Council and Essex County Council.	
Geographical Area	The broad location for the Garden Community is identified in the Section 1 Local Plan. The precise boundaries will be designated in this DPD.	
Chain of Conformity	Tendring and Colchester Local Plans The relevant Planning Acts and Regulations Essex Minerals and Waste Plans National Planning Policy Framework (NPPF)	
Indicative timetable for production		
	Current TDC and CBC Local Development Scheme Date	Completed / Amended Projected Date
Document Preparation	Winter 2020/21 – Winter 2021/22	Winter 2020/21 – Winter 2021/22
Member approval of draft DPD	Winter 2021/22	Spring 2022
Draft DPD Consultation – Regulation 18	Winter 2021/22	Spring 2022
Document Preparation	Spring/Autumn 2022	Summer 2022 - Winter 2022/23
Member approval of submission DPD	Autumn 2022	Spring 2023
Submission DPD Consultation – Regulation 19	Autumn 2022	Summer 2023
Submission of DPD and Summary of Comments Received to Secretary of State	Winter 2022	Summer 2023
Independent Examination	Winter 2022	Autumn 2023
Inspector’s Report	Spring 2023	Winter 2023
Consultation on Modifications	Summer 2023	Winter 2023
Adoption	Summer/Autumn 2023	Winter 2023

A.1 Appendix 4: Submission Version DPD Policies Map

